

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Imperial Post Office
Imperial, Texas 79743

Docket No. A2012-116

PUBLIC REPRESENTATIVE COMMENTS

(March 21, 2012)

On January 11, 2012 the Commission received a petition for review of the Postal Service's determination to close the Imperial Post Office from Maxie King, Wanda Lewis, Nellie McDowell, and the Texan Public Library (collectively referred to as the "Petitioners"). Collectively, the Petitioners are concerned about travelling to other Post Offices further away, the misinformation concerning their Postmaster's retirement, and the fact that travelling to a cluster box is not more convenient than traveling to the Imperial Post Office where they also have 24-hour access to their mail. The Petitioners' are also concerned that the Grandfalls Post Office, which is 11 miles away from the Imperial Post Office, appears as a candidate list in the Retail Optimization Initiative.

The Postal Service responded to the Petitioners' concerns on March 6, 2012 in its Comments Regarding Appeal and in its Final Determination.¹ The Postal Service highlights the security and accessibility of cluster box units (CBUs). Postal Service Comments at 7. The Postal Service also explains that customers can receive many postal services from the Highway Contract Route carrier. *Id* at 9.

Concerning the status of the Grandfalls Post Office, the Postal Service asserts that 39 U.S.C. section 404(d) limits the Commission's review and that there has been no change to the operations at the Grandfalls Post Office.

In regards to the effect on the Imperial community, the Postal Service explains customers will receive similar service at nearby Post Offices. *Id.* at 13-14. The Postal

¹ The Final Determination (FD) can be found at Item No. 47 in the Administrative Record (AR).

Service also explains that citizens can meet at other business, churches and residences in the community to socialize and share information. *Id* at 15.

The Postal Service estimates that it will save \$47,048 annually from closing the Imperial Post Office. *Id.* at 16. This figure takes into account an estimated \$5,231 in replacement services. AR Item No. 47 at 7.

From the Postal Service Comments, and the administrative record it appears that the Postal Service has considered all of the concerns raised by the Petitioners. The Public Representative finds that no persuasive argument has been presented which would prevent the Commission from affirming the Postal Service's determination to close the Imperial Post Office. The Public Representative concludes that the Postal Service has followed applicable procedures, that the decision to close the Imperial Post Office is neither arbitrary nor capricious, and that the Postal Service's decision is well supported.

Respectfully Submitted,

Natalie R. Ward
Public Representative for
Docket No. A2012-116

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